I oppose the proposed amendment that would eliminate the requirement that individuals pass a telegraphy examination in order to qualify for any amateur radio license. I support the retention of at least a 5 word per minute Morse code proficiency requirement for the Extra Class amateur radio operator license.

In the Notice of Proposed Rule Making, the Commission states that its decision to advocate the elimination of all demonstrations of Morse proficiency is based upon three unsubstantiated beliefs. The Commission expresses its belief that such an amendment would (1) encourage interested individuals to become amateur radio operators; (2) eliminate a requirement that *may* discourage amateur radio licensees from advancing their skills in the communication and technical phases of amateur radio; and (3) promote more efficient use of the radio spectrum.

With regard to the first of these, it is self-evident that the retention of a 5 wpm requirement for the Extra Class license would preclude no one from obtaining an amateur radio license. On the contrary, individuals interested in becoming amateur radio operators could not only do so but, they could do so in such a manner that would grant them operating privileges on all of the frequency bands and using all of the various modulation techniques currently available to the amateur radio service. I believe that it is wholly illogical to maintain that the denial of potential amateur radio operators the relatively small, additional spectral privileges of the Extra Class operator's license because of an inability to demonstrate a 5 wpm telegraphy proficiency will effectively discourage those individuals from obtaining any class of amateur radio license or, conversely, encourage them to become amateur radio operators.

Similar remarks are applicable to the second belief expressed by the Commission and re-stated above. In its remarks, the Commission states that retention of a Morse code proficiency requirement "may" discourage amateur radio operators from advancing their communication and technical skills. It is worthwhile to note that the Commission's comments are, at best, speculative in nature and that in the NPRM, the Commission does not indicate or describe what relationship, if any, exists between demonstrating proficiency with Morse code and the improvement of one's technical or communication skills. Of what skills or technical interests is an amateur radio operator denied or discouraged from advancing if he/she is required to demonstrate proficiency in Morse code and is provided only with additional spectral privileges (i.e., with no privileges for additional operating modes or modulation methods) by so doing? Is not a proficiency with Morse code a legitimate form of advancement of one's communication skills?

Successful demonstration of proficiency with Morse code is logical given that the Commission will grant amateur operators the privilege of operating using this modulation technique. In the case of Extra Class license, the holder is granted the privilege of operating his/her station throughout the greatest spectral range available to amateur radio operators, a portion of which has been specifically designated for use with Morse code, exclusive of phone and image. Thus, a practical demonstration of an applicant's ability

to properly utilize those privileges is only logical given that the Extra Class license grants the fullest of operating privileges.

To suggest or conclude that a practical demonstration of a prospective licensee's ability to use Morse code will prevent or discourage him or her from developing their skills or technical interests is analogous to improperly concluding that a practical driving examination which is conducted to assess an individual's ability to properly operate a motor vehicle ultimately compels the licensee to drive an automobile at the expense of discouraging walking, riding a bicycle, or using public transportation. The Commission's rationale for deleting all Morse code proficiency requirements is, at best, illogical and untenable.